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Clerk, U S District Court
District Of Montana
Missoula
VJB

ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

UNITED STATES OF AMERICA,	CR 17 - 48 -GF-BMM
Plaintiff,	INDICTMENT
vs.	SEXUAL EXPLOITATION
JAYCOB TYLER KUTZERA,	OF A CHILD
Defendant.	Title 18 U.S.C. § 2251(a) (Counts 1-36) (Penalty: Mandatory minimum 15 to 30 years imprisonment, up to \$250,000 fine, five years to lifetime supervised release, and \$5,000 special assessment)
	FORFEITURE Title 18 U.S.C. § 2253(a)

THE GRAND JURY CHARGES:

COUNT 1 through COUNT 36

That on or about the dates set forth in the table below, in Cascade County, in the State and District of Montana and elsewhere, the defendant, JAYCOB TYLER

KUTZERA, did employ, use, persuade, induce, entice, and coerce any minor, Jane Doe, who is known to the defendant but whose name is withheld to protect her identity, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, namely the file identified with the associated date in the table below, knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce, and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2251(a).

COUNT	DATE	FILE
1	April 7, 2016	Image sent via Facebook at 5:08 p.m.
2	April 7, 2016	Image sent via Facebook at 10:37 p.m.
3	April 8, 2016	Image sent via Facebook at 2:37 p.m.
4	April 11, 2016	Image sent via Facebook at 5:15 p.m.
5	July 10, 2016	video file 3-428109.mp4
6	July 10, 2016	video file 3-428529.mp4
7	July 10, 2016	video file 3-428532.mp4
8	July 10, 2016	image file 3-428494.jpg
9	July 10, 2016	image file 3-428504.jpg

10	July 10, 2016	Image file 3-428512
11	July 10, 2016	Image file 3-428513
12	July 10, 2016	Image file 3-428514
13	July 10, 2016	Image file 3-428515
14	July 10, 2016	Image file 3-428516
15	July 10, 2016	Image file 3-428518
16	July 10, 2016	Image file 3-428519
17	July 10, 2016	Image file 3-428521
18	July 11, 2016	image file 3-428018.jpg
19	July 11, 2016	image file 3-428500.jpg
20	July 11, 2016	image file 3-428502.jpg
21	July 11, 2016	image file 3-428497.jpg
22	July 11, 2016	image file 3-428488.jpg
23	July 11, 2016	image file 3-428505.jpg
24	July 11, 2016	image file 3-428493.jpg
25	July 11, 2016	image file 3-428491.jpg
26	July 11, 2016	image file 3-428495.jpg
27	July 11, 2016	image file 3-428498.jpg
28	July 11, 2016	image file 3-428503.jpg

29	July 11, 2016	image file 3-428501.jpg
30	July 11, 2016	image file 3-428099.jpg
31	July 11, 2016	image file 3-428492.jpg
32	July 11, 2016	image file 3-42898.jpg
33	July 11, 2016	image file 3-428510.jpg
34	July 12, 2016	image file 3-239651.jpg
35	July 12, 2016	image file 3-428509.jpg
36	October 1, 2016	Video found on Kutzera's LG cellular phone with hash value: d27656675c8a2695edd1575f3d696bce

FORFEITURE ALLEGATION

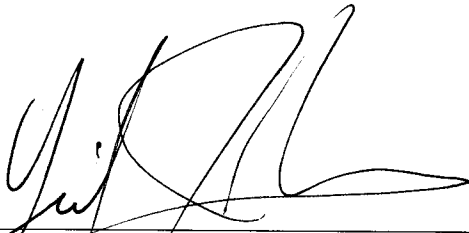
As a result of the commission of the crimes described above, and upon his conviction, the defendant, JAYCOB TYLER KUTZERA, shall forfeit to the United States, all right, title and interest in the following described property that represents property used to commit the offense:

- HP Slimline Desktop computer, s/n 4C14220ZX4, and
- LG LGMS345 cell phone, s/n 512CYAS357768,

pursuant to 18 U.S.C. § 2253(a).

A TRUE BILL.

Foreperson signature redacted. Original document
filed under seal.

A handwritten signature in black ink, appearing to be 'Leif M. Johnson', written over a horizontal line.

LEIF M. JOHNSON
Acting United States Attorney

A handwritten signature in black ink, appearing to be 'Joseph E. Thaggard', written over a horizontal line.

JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney